

EXHIBIT G

Page 1

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF TEXAS
3 SHERMAN DIVISION

4 THE STATE OF TEXAS, et al. : Civil Action No.
5 Plaintiffs, : 4:20-cv-00957-SDJ
6 vs. :
GOOGLE LLC, :
Defendants. :
5

24 Job No. MDLG6658171

Page 2

1 APPEARANCES :

2

3

4 MAYER BROWN
5 BY: JONATHAN D. JAFFE, ESQUIRE
6 Two Palo Alto Square
7 3000 El Camino Real
8 Palo Alto, California 94306
9 jjaffe@mayerbrown.com
10 (650) 331-2085
11 Representing the Plaintiff,
12 State of Texas

13

14

15 NORTON ROSE FULBRIGHT US LLP
16 BY: ABRAHAM CHANG, ESQUIRE
17 1301 McKinney
18 Suite 5100
19 Houston, Texas 77010
20 (713) 651-5151
21 abraham.chang@nortonrosefulbright.com
22 - and -
23 BY: DANIELLA TORREALBA, ESQUIRE
24 799 9th Street NW
Suite 1000
Washington, DC 20001
daniellatorraelba@nortonrosefulbright.com
Representing the Plaintiff

Page 3

1 APPEARANCES: (Continued)
2

3 AXINN, VELTROP & HARKRIDER LLP
4 BY: DAVID R. PEARL, ESQUIRE
5 1901 L Street NW
6 Washington, DC 20036
7 (202) 912-4700
8 dpearl@axinn.com

9
10 - and -
11

12 BY: CHRISTOPHER ERICKSON, ESQUIRE
13 114 West 47th Street
14 New York, New York 10036
15 (212) 728-2200
16 cerickson@axinn.com

17
18 - and -
19

20 BY: DARPAN R. SINGH, ESQUIRE
21 55 Second Street
22 San Francisco, California 94105
23 (415) 490-2000
24 dsingh@axinn.com
Representing Google LLC

17 ALSO PRESENT:
18 Zach Hone, Videographer
19 Evan Wolfe, Trial, Technician
20 Melonie Montford Derose (LLF)
21 Steven Sparling, Google LLC
22
23
24

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1 - - -
2 I N D E X
3 - - -
4

5 Testimony of: [REDACTED], Ph.D.
6

7 By Attorney Chang

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8 - - -
9 E X H I B I T S
10 - - -
11

12 NO. DESCRIPTION PAGE

13 Exhibit 110 No Bates [REDACTED]

14 Wikipedia Page 25

15 Exhibit 111 No Bates [REDACTED]

16 LinkedIn Page 42

17 Exhibit 112 GOOG-AT-MDL-008522383-2404

18 Perf Rating Support Note
Template 52

19 Exhibit 113 GOOG-AT-MDL-017768272-8275

20 2/28/22 E-mail, [REDACTED] to [REDACTED] 76

21 Exhibit 114 GOOG-AT-MDL-016488656-8675

22 Promo
Packet 93

23 Exhibit 115 GOOG-AT-MDL-B-004637454-7457

24 11/12/15 E-mail, [REDACTED] to [REDACTED] 158

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		- - -	E X H I B I T S	- - -	
	NO.		DESCRIPTION		PAGE
1	Exhibit 116	GOOG-AT-MDL-018794833-4835			
2		8/17/21 E-mail, [REDACTED] to [REDACTED]			
3					179
4	Exhibit 117	GOOG-DOJ-14011118-1120			
5		9/17/14 E-mail, [REDACTED] to [REDACTED]			
6					204
7	Exhibit 118	GOOG-DOJ-32277191-7210			
8		7/9/14 E-mail, [REDACTED] to [REDACTED]			
9					218
10	Exhibit 119	GOOG-NE-13231861-1874			
11		8/9/14 Draft Enhanced Dynamic			
12		Revenue Sharing			
13					256
14	Exhibit 120	GOOG-DOJ-14008627-8633			
15					259
16	Exhibit 121	GOOG-AT-MDL-014566659-6660			
17		8/25/15 E-mail, [REDACTED] to [REDACTED]			
18					259
19	Exhibit 122	GOOG-AT-MDL-008962081-2082			
20		9/26/18 E-mail, [REDACTED] to [REDACTED]			
21					303
22	Exhibit 123	GOOG-AT-MDL-012687687-7689			
23		2/4/21 E-mail, [REDACTED] to [REDACTED]			
24					320
25	Exhibit 124	GOOG-AT-MDL-009089549-9550			
26		5/31/22 E-mail, [REDACTED] to [REDACTED]			
27					329

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1 - - -
2 E X H I B I T S
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5 NO. DESCRIPTION PAGE
6
7 Exhibit 125 GOOG-AT-MDL-019688335-8363 342
8 Slide Deck, Publisher Floor
9 Optimizations
10
11 Exhibit 126 GOOG-AT-MDL-012689344-9346 366
12 11/3/21 E-mail, [REDACTED] to [REDACTED]
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DEPOSITION SUPPORT INDEX

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- - -

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5 Direction to Witness Not to Answer

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None

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10 Request for Production of Documents

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None

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15 Stipulations

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20 Question Marked

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None

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1 I know we had a quick break
2 for the clawback, but it's been
3 about an hour.

4 ATTORNEY CHANG: Are we --
5 can we get a time check, please?
6 Let's go off the record.

7 VIDEO TECHNICIAN: Off
8 record. The time is 1:02.

9 - - -
10 (Whereupon, a luncheon
11 recess was taken.)

12 - - -
13 VIDEO TECHNICIAN: Back on
14 record. Time is 1:47.

15 BY ATTORNEY CHANG:

16 Q. Before we get into things.
17 [REDACTED] during any of
18 our breaks today did you discuss the
19 substance of your testimony with any of
20 your attorneys?

21 A. No, sir.

22 ATTORNEY CHANG: Mr. Wolfe,
23 will you pull up
24 GOOG-DOJ-32277191?

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(Whereupon, Exhibit-118,

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GOOG-DOJ-32277191-7210, 7/9/14

4

E-mail, [REDACTED] to [REDACTED] was

5

marked for identification.)

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- - -

7

BY ATTORNEY CHANG:

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Q. Will you let me know when

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you can see the document?

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A. I can see the document.

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[REDACTED]

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22 Q. Thank you.
23 And I'm just interested --
24 okay. Well, all right, let me ask you

Page 220

1 this question first.

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13 ATTORNEY PEARL: Objection.

14 Form.

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18 BY ATTORNEY CHANG:

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6 ATTORNEY PEARL: Objection.

7 Form.

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16 BY ATTORNEY CHANG:

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7 But I certainly don't
8 remember specifically what
9 happened.

10 BY ATTORNEY CHANG:

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ATTORNEY PEARL: Objection.

Form.

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13 BY ATTORNEY CHANG:

14 Q. So you always leave your
15 Chat history on?

16 A. I'm sure there have been
17 some instances, I can't remember the
18 specific times, when I've turned it off
19 over my 13 years at Google.

20 But almost ubiquitously I
21 make a point to leave it on, because it's
22 just easier for me to work with my
23 colleagues in that way and search for
24 things.

1 A. There may be some days when
2 it's zero. But I would say it's usually
3 at least one Chat conversation.

4 Q. Would you have more than
5 five a day?

6 ATTORNEY PEARL: Objection.

7 Form.

8 THE WITNESS: It's certainly
9 possible.

10 BY ATTORNEY CHANG:

11 Q. How about ten? Would you
12 have more than ten a day?

13 ATTORNEY PEARL: Objection.

14 Form.

15 THE WITNESS: It depends on
16 the day. I'm sure there are days
17 where I've had more than ten.

18 BY ATTORNEY CHANG:

19 Q. Do you ever have Chat
20 conversations that continue over multiple
21 days?

22 A. That has happened.

23 Q. Longer than a week?

24 A. I can't really speculate on

Page 382

1 that. That seems fairly unlikely, to be
2 honest with you. Usually, Chat is pretty
3 ephemeral.

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6 ATTORNEY PEARL: Objection

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to form.

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10 BY ATTORNEY CHANG:

11 Q. Do you know the process for
12 turning history on and off for a Google
13 Chat?

14 ATTORNEY PEARL: Objection.

15 Form.

16 THE WITNESS: Yes, sir. I
17 know how to turn history on and
18 off in Google Chat.

19 BY ATTORNEY CHANG:

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6 ATTORNEY CHANG: Mr. Wolfe,
7 will you take that document down?
8 Thank you.

9 BY ATTORNEY CHANG:

10 Q. Has a Google employee ever
11 asked to move a Chat conversation
12 offline?

13 ATTORNEY PEARL: Objection.
14 Form.

15 THE WITNESS: I've certainly
16 had times when I was in a Chat
17 with another Google employee where
18 they may have suggested we meet in
19 person to discuss something, if
20 that is your question.

21 Is that what you mean by
22 "offline"?

23 BY ATTORNEY CHANG:

24 Q. Have you ever asked to take

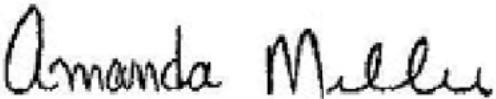
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1 CERTIFICATE
2
3

4 I, Amanda Maslynsky-Miller, Certified Realtime
5 Reporter, do hereby certify that prior to the
6 commencement of the examination, [REDACTED]
7 [REDACTED], was remotely sworn by me to testify to
8 the truth, the whole truth and nothing but the
9 truth.

10 I DO FURTHER CERTIFY that the foregoing is a
11 verbatim transcript of the testimony as taken
12 stenographically by me at the time, place and
13 on the date hereinbefore set forth, to the
14 best of my ability.

15 I DO FURTHER CERTIFY that I am neither a
16 relative nor employee nor attorney nor counsel
17 of any of the parties to this action, and that
18 I am neither a relative nor employee of such
19 attorney or counsel, and that I am not
20 financially interested in the action.

21 

22 Amanda Miller
23 Certified Realtime Reporter
24 Dated: April 22, 2024

25 (The foregoing certification of this
26 transcript does not apply to any reproduction
27 of the same by any means, unless under the
28 direct control and/or supervision of the
29 certifying reporter.)